

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARVIN HINOJOSA ET AL.,

Defendants.

Case No. 24-00543-01/02-CR-H-EW

**UNOPPOSED MOTION TO DISCLOSE DISCOVERABLE
MATERIALS PURSUANT TO A PROTECTIVE ORDER**

Pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, the United States asks the Court to permit it to meet its discovery pursuant to a protective order restricting disclosure.

Certain materials that implicate third-party privacy information and law enforcement sensitive information are included within the materials to be provided to defense counsel. Furthermore, there are sensitivities associated with the disclosure of investigative methods, names, and contact information of witnesses. The material to be provided to defense counsel cannot be redacted adequately because it has evidentiary value in this case. In addition, many of these materials are electronic in origin, making mitigation of these concerns through redaction problematic.

In addition to protecting the materials themselves, the United States also wishes to prevent any harassment of possible witnesses.

All these materials are collectively referred to in the proposed Protective Order as “Protective Order Material(s).” These materials include: all documents authored by law enforcement officers, along with supporting audio and video recordings, photographs, search

warrants and other legal process secured in connection with the investigation, and criminal history reports. The proposed order accompanies this motion.


Defense counsel has been contacted and has no objection to the proposed protective order.

See Certificate of Conference, infra.

WHEREFORE, the United States respectfully asks this Court to permit disclosure of discovery materials consistent with the above requests.

ALAMDAR S. HAMDANI
United States Attorney
Southern District of Texas

By


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on November 18, 2024, to the CM-ECF system of the United States District Court for the Southern District of Texas for electronic delivery to all counsel of record.



Byron H. Black
Assistant United States Attorney

CERTIFICATE OF CONFERENCE

I certify that I have communicated with the following defense counsel, who have no objection to this motion:

Joyce A. Raynor
Counsel for Darvi Hinojosa

Anthony P. Troiani
Counsel for John Sblendorio


Byron H. Black
Assistant United States Attorney